## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA NORFOLK DIVISION

THE COLEMAN COMPANY, INC.,

Plaintiff/Counterclaim Defendant,

V.

TEAM WORLDWIDE CORPORATION,

Defendant/Counterclaim Plaintiff.

C.A. No: 2:20-cv-351-RGD

## **COLEMAN'S MOTION TO COMPEL**

Plaintiff and Counterclaim Defendant The Coleman Company, Inc. ("Coleman"), respectfully moves this Court pursuant to Fed. R. Civ. P. 37 to compel Defendant and Counterclaim Plaintiff Team Worldwide Corporation ("TWW) to respond to a single interrogatory and request for production to provide evidence as to the total compensation paid to a technical expert TWW has repeatedly used in patent disputes over the past four years, Dr. Glen Stevick, who is TWW's expert on both invalidity and infringement issues in this case.

The grounds and reasons for Coleman's motion are fully set forth in the brief in support filed contemporaneously with this motion.

Date: September 8, 2021

## Respectfully submitted,

By: s/R. Braxton Hill, IV
R. Braxton Hill, IV (VSB 41539)
Michael W. Smith (VSB 01125)
CHRISTIAN & BARTON, LLP
901 East Cary Street, Suite 1800
Richmond, Virginia 23219
Tel: (804) 697-4100
Fax: (804) 697-4112
bhill@cblaw.com
msmith@cblaw.com

John W. Harbin (pro hac vice)
Gregory J. Carlin (pro hac vice)
David S. Moreland (pro hac vice)
Steven M. Philbin (pro hac vice)
MEUNIER CARLIN &
CURFMAN LLC
999 Peachtree Street NE, Suite 1300
Atlanta, Georgia 30309
(404) 645-7700
jharbin@mcciplaw.com
gcarlin@mcciplaw.com
dmoreland@mcciplaw.com
sphilbin@mcciplaw.com

Counsel for the Plaintiff, The Coleman Company, Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 8th day of September 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

By: s/R. Braxton Hill, IV

R. Braxton Hill, IV (VSB 41539) CHRISTIAN & BARTON, LLP 901 East Cary Street, Suite 1800 Richmond, Virginia 23219

Tel: (804) 697-4100 Fax: (804) 697-4112 bhill@cblaw.com

Counsel for the Plaintiff, The Coleman Company, Inc.